

BMW Group

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Amendment of Sections 15.35 and 15.253
of the Commission's Rules Regarding
Operation of Radar Systems in the 76-77
GHz Band.

Amendment of Section 15.253 of the
Commission's Rules to Permit Fixed Use of
Radar in the 76-77 GHz Band.

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) ET Docket No. 11-90
) RM-11555
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) ET Docket No. 10-28
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COMMENTS OF THE BMW GROUP

On behalf of The BMW Group, BMW of North America, LLC (BMW) appreciates the opportunity to submit these additional comments in response to the Notice of Proposed Rule Making (NPRM) issued by the Commission in the above-captioned proceeding:

BMW has been offering Advanced Cruise Control (ACC) systems using 77GHz radars for more than 10 years in several countries (including the US). The main sensor in the ACC system is the radar used for collision mitigation and avoidance systems, which customers expect to be available on all roads, independent from RA-Stations or fixed services.

In addition, in Europe, where RA-Stations are much closer to public roads than in the US and power reduction at "no-motion" situation is not required, there have been no reports with regards to interference with such RA-Stations due to the use of ACC radars.

For the above mentioned reasons, BMW does not see the need for additional technical restrictions on vehicular radars, such as deactivation requirements.

Last, we would like to reiterate our concerns with the Commission's proposal to allow fixed radar installations regardless of location. For the case of a general usage of such radar systems, compatibility studies have to be undertaken to ensure that vehicle radar systems (for safety applications) are not disturbed.

If you or members of your staff have any questions, please contact me at 201-571-5360 or Máximo Avilés at 201-571-5041 or at Maximo.Aviles@bmwna.com.
Respectfully submitted on August 1st, 2011.

Company

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Sincerely,



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